

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-_____
v.	:	DATE FILED: _____, 2021
JOHN ADAMS	:	18 U.S.C. § 1591(a)(1), (b)(2), (c)
MERCEDES HAMPTON-DEVERO	:	(sex trafficking of a minor - 2
a/k/a "JAS,"	:	counts)
a/k/a "JAZZ,"	:	18 U.S.C. § 2251(a), (e)
MALACHAI KENDALL	:	(production of child pornography -
a/k/a "KAH,"	:	1 count)
a/k/a "KAI"	:	18 U.S.C. § 2252(a)(2), (b)(1)
	:	(distribution of child pornography
	:	- 1 count)
	:	18 U.S.C. § 1519 (tampering with
	:	evidence in a federal investigation -
	:	1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between on or about January 10, 2020, and on or about January 30, 2020, in Philadelphia County, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOHN ADAMS,
MERCEDES HAMPTON-DEVERO,
 a/k/a/ "JAS,"
 a/k/a "JAZZ, and
MALACHAI KENDALL
 a/k/a/ "KAH,"
 a/k/a/ "KAI,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained J.A., a minor whose identity is known to the grand jury, and

attempted to do so, and aided and abetted the same, knowing and in reckless disregard of the fact that J.A. was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe J.A.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), and

2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 10, 2020, and on or about January 30, 2020, in Philadelphia County, in the Eastern District of Pennsylvania and elsewhere, defendants

**JOHN ADAMS,
MERCEDES HAMPTON-DEVERO,
a/k/a/ "JAS,"
a/k/a "JAZZ, and
MALACHAI KENDALL
a/k/a/ "KAH,"
a/k/a/ "KAI,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained S.H., a minor whose identity is known to the grand jury, and attempted to do so, and aided and abetted the same, knowing and in reckless disregard of the fact that S.H. was under the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe S.H.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), and

2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 10, 2020, and on or about January 13, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MALACHAI KENDALL,
a/k/a "KAH,"
a/k/a "KAI,"**

employed, used, persuaded, induced, enticed and coerced J.A., a minor whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, that is, by filming J.A. engaging in sexually explicit conduct and transmitting the image to J.A. via text messaging, and defendant KENDALL knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MALACHAI KENDALL,
a/k/a "KAH,"
a/k/a "KAI,"**

knowingly distributed a visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which contained materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct, that is, defendant KENDALL transmitted by text messaging to J.A., a minor who is known to the grand jury, a video of J.A. engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 10, 2020, and on or about February 6, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ADAMS

knowingly altered, destroyed, concealed, and covered up any record, document, and tangible object that can be used to record and preserve information, that is, the contents of a Samsung Galaxy S10 cellular telephone, bearing telephone number 267-588-7779, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), 2255(a), and 1519, as set forth in this Indictment, defendants

**JOHN ADAMS,
MERCEDES HAMPTON-DEVERO,
a/k/a/ "JAS,"
a/k/a/ "JAZZ,"
MALACHAI KENDALL,
a/k/a/ "KAH,"
a/k/a/ "KAI"**

shall forfeit to the United States of America:

(a) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of such violations, and any property traceable to such property; and

(b) any property, real or personal, constituting or derived from any proceeds traceable to such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

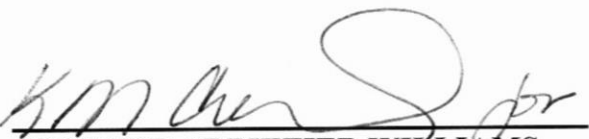
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Sections 1594(d) and (e).

A TRUE BILL:


GRAND JURY FOREPERSON


JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

No. 2020-00681 _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania
Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOHN ADAMS, MERCEDES HAMPTON DEVERO a/k/a "JAS" a/k/a "JAZZ," MALACHAI
KENDALL a/k/a "KAH" a/k/a "KAI"

INDICTMENT

Counts

18 U.S.C. §1591(a)(1), (b)(2), (c) (sex trafficking of a minor – 2 counts)
18 U.S.C. §2251 (a), (e) (production of child pornography – 1 count)
18 U.S.C. §2252 (a)(2), (b)(1) (distribution of child pornography – 1 count)
18 U.S.C. §1519 (tampering with evidence in a federal investigation – 1 count)
18 U.S.C. §2 (aiding and abetting)

Notice of Forfeiture

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Filed in open court this _____ day,
Of _____ A.D. 20_____

Clerk

Bail, \$ _____